



March 6, 2020

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
**Public Service Commission of South Carolina**  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Petition of Bridgestone Americas Tire Operations, LLC for an Order  
Compelling Dominion Energy South Carolina to Allow the Operation of  
a 1980 kW AC Solar Array as Authorized By State Law;  
Docket No. 2020-63-E

Dear Ms. Boyd:

By Order No. 2020-179, dated March 4, 2020, in the above-referenced docket, the Public Service Commission of South Carolina ("Commission") ordered Dominion Energy South Carolina, Inc. ("DESC") to inform the Commission whether DESC's filing dated February 21, 2020, constitutes its answer to the petition filed by Bridgestone Americas Tire Operations, LLC ("BATO") on February 14, 2020 ("Petition"). In compliance with Order No. 2020-179, DESC hereby informs the Commission that DESC's February 21, 2020 filing constitutes its answer to the Petition, and encloses for filing a verification.<sup>1</sup>

For the sake of clarity, and to the extent that the Commission construes BATO's "Petition" as a complaint, DESC hereby supplements its February 21 answer to include the following:

DESC specifically denies BATO's allegation that "DESC's actions violate S.C. Code Ann. Section 58-27-460, Order No. 2016-191, and the parties' contract for electric service." DESC avers it has not violated any statute, rule, regulation or order administered or issued by the Commission. Indeed, BATO filed its Petition only because DESC is consistently upholding and applying the Commission's rules, regulations, and orders governing the interconnection and parallel operation of an electric generating facility with the electric grid and ensuring that BATO complies with the same rules that are applicable to every other entity

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<sup>1</sup> Notably absent from BATO's filing is a verification as required by S.C. Code Ann. Regs. § 103-822 (2012).

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that seeks to interconnect a generating facility to the electric grid despite BATO's argument that its electric generating facility is not subject to state or federal law and that it may interconnect its facilities to the electric grid at its discretion. Any other material allegations not specifically admitted are hereby denied.

We are providing a copy of this letter and verification to counsel for BATO and the South Carolina Office of Regulatory Staff.

If you have any questions, please advise.

Very truly yours,



Matthew W. Gissendanner

cc: Scott Elliott, Esquire  
Robert David Boon II, Esquire  
Jeffrey M. Nelson, Esquire  
(all via electronic mail and U.S. First Class mail)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-63-E**

**IN RE:**

Petition of Bridgestone Americas  
Tire Operations, LLC for an Order  
Compelling Dominion Energy South  
Carolina to Allow the Operation of a  
1980 kW AC Solar Array as Authorized  
By State Law

**VERIFICATION**

Personally appeared before me Matthew J. Hammond who, having first been duly sworn,  
deposes and states as follows:

1. My name is Matthew J. Hammond, and I am the Manager of Transmission Support for Dominion Energy South Carolina, Inc. ("DESC"). Among other things, I am responsible for the management and administration of DESC's interconnection activities. I am competent to make this verification.

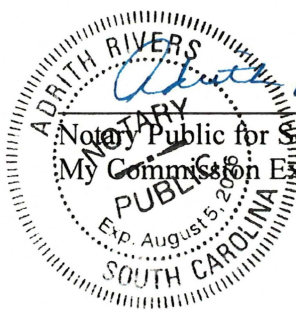
2. This verification is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by DESC. I am familiar with the matters set forth in the Petition of Bridgestone Americas Tire Operations, LLC ("BATO") dated February 14, 2020 ("BATO Petition"), and have personally worked on BATO's request for interconnection and parallel operation of its 1,980 kilowatt solar array with the DESC system.

3. I assisted DESC's attorney in preparing DESC's letter dated February 21, 2020, which was filed in response to the BATO Petition, and its letter dated March 6, 2020, which was filed in response to Commission Order No. 2020-179. I have read both letters and verify that the

information contained therein is true and accurate to best of my knowledge, information, and belief.

Matthew J. Hammond  
Matthew J. Hammond

Sworn to and subscribed before me  
this 6th day of March, 2020

 Adrith Rivers  
Notary Public for South Carolina  
My Commission Expires: Aug. 5, 2026